

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS MOELLER TO INTERROGATORY OF UNITED PARCEL SERVICE
(UPS/USPS-T32—1)**

The United States Postal Service hereby provides the response of witness Moeller to the following interrogatory of United Parcel Service: UPS/USPS-T32—1, filed on November 15, 2001.

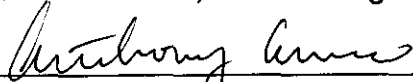
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Anthony Alverno
Attorney

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November 29, 2001

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MOELLER
TO INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-T32-1. Refer to your response to interrogatory VP/USPS-T32-5(c), in which you discuss two internal data systems -- "Advance" and "CONFIRM." Do either of these data systems contain performance data for Express Mail, Priority Mail, or Parcel Post? If so, provide performance data for each of these services from these data systems from FY 1998 through the present.

RESPONSE:

No.

DECLARATION

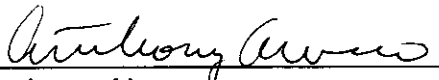
I, Joseph D. Moeller, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.


JOSEPH D. MOELLER

Dated: 11-29-01

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Anthony Alverno

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